

**IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA
IN AND FOR THE SIXTEENTH JUDICIAL CIRCUIT**

2024 JAN 29 P 12:39

**Trenton Rogers Garmon,
Trentongarmon.ai,
Plaintiff & Affiant,**

V.

**Google LLC & Alphabet Inc.
doing business as "Google",**

Defendants.

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Case Numbers:

4:23-cv-01525-CLM

**PLAINTIFFS RESPONSE TO DEFENDANTS
MOTION TO DISMISS FAC**

Comes now the Plaintiffs and do file this Response to Defendant's Motion to Dismiss First Amended Complaint. The Plaintiffs are entitled to legal relief following discovery and a jury trial. Truth and Law constitutional law should prevail, albeit damages are at issue. The law is clear and the Defendant's motion should be denied. The Plaintiffs assert the Motion to Dismiss is due be denied. The Defendants are not entitled to a dismissal by law, have confalated the claims in order to improperly argue defensive elements and are premature in their Motion to Dismiss given discovery has not been conducted. The Defendants fail to recognize and properly describe the dynamics of their Platform's services to the Court despite the Pleading making the various services clear, hiding the underlying malicious and tortious factors coded into the algorithm.

Plaintiffs respond and move for this Honorable Court to deny the Motion to Dismiss. Respectfully submitted this the 23rd day of January 2024.

s/ Trenton Garmon
TRENTON GARMON

CERTIFICATE OF SERVICE: I hereby certified that a copy of the foregoing and all filings have been served upon the Defendants by electronic mail and U.S. Mail postage prepaid this the date of filing.

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s/ Trenton Garmon
TRENTON GARMON

Rebels, at 35901

United States District Clerk
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